

EXHIBIT D

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOSEPH MANTHA, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

QUOTEWIZARD.COM, LLC,

Defendant.

Civil Action No. 1:19-cv-12235-LTS

**PLAINTIFF'S RESPONSE TO DEFENDANT'S FIFTH REQUEST
FOR PRODUCTION OF DOCUMENTS**

Plaintiff, Joseph Mantha, hereby propounds, pursuant to Fed. R. Civ. P. 34, to the Defendant's Fifth Set of Requests for Production of Documents

Requests for the Production of Documents

45. Any and all documents showing credits or payments requested by you and/or given to you by Dr. Franklin Perkins School in 2019 for your use of your cell phone and/or cell phone data in connection with or related to your employment.

OBJECTION: Plaintiff objects to this request as it is far in excess of the number (2) of sets of document requests permitted by permitted by Local Rule 26.1(c), without leave or court. Plaintiff further objects noting that the Plaintiff was questioned at length at his deposition as to this topic under oath. Plaintiff further objects to this request as it seeks the production of documents that are in his employers' possession or control, and have already been produced by his employer.

46. Any and all telephone directories for Dr. Franklin Perkins School from the Ring Central application or any other source, including any other electronic application(s).

ANSWER: (2) of sets of document requests permitted by permitted by Local Rule 26.1(c), without leave or court. Plaintiff further objects to this request as it seeks the production of documents that are in his employers' possession or control, and have already been produced by his employer.

PLAINTIFF,
By his attorneys

/s/Matthew P. McCue
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CERTIFICATE OF SERVICE

I, hereby certify that on October 13, 2020, I served the foregoing via e-mail to counsel of record.

/s/ Matthew P. McCue
Matthew P. McCue